

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

Julius Bryant,

Plaintiff,

Case No. 4:21-cv-76

v.

**Elite Integrity, LLC d/b/a
Auto Protection Plus,**

Defendant.

PLAINTIFF'S APPLICATION FOR ENTRY OF DEFAULT

TO THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS::

Pursuant to Rule 55(a), Plaintiff, Julius Bryant ("Plaintiff"), hereby requests entry of a default against Defendant Elite Integrity, LLC d/b/a Auto Protection Plus for failure to plead or otherwise defend the claims against her within the time prescribed under the Rules. Fed. R. Civ. P. 12(a)(1)(A)(i); 55(a). In support of this Application for Entry of Default Plaintiff relies upon his original Complaint [ECF No. 1] and proof of service upon Defendant [ECF No. 7].

On January 22, 2021, Plaintiff filed his Complaint in the above-captioned proceeding. Service of Summons and Complaint on Defendant was effected on February 24, 2021. Proof of service was filed with the Court on February 4, 2021 [ECF No. 7]. The time for Defendant to file a responsive pleading expired on February 23, 2021. See Fed. R. Civ. P. 12(a)(1)(A)(i). To date, Defendant has not answered, responded, or otherwise defended the suit. Accordingly, Plaintiff requests that the clerk enter default against Defendant. After default is entered, Plaintiff intends to move for default judgment pursuant to Rule 55.

DATED this March 12, 2021

Respectfully submitted,

Dated: March 12, 2021

By: s/ Amy L. Bennecoff Ginsburg
Amy L. Bennecoff Ginsburg, Esq.
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CERTIFICATE OF SERVICE

I, AMY L. B. GINSBURG, ESQUIRE, hereby certifies that a true and correct copy of the request for default was electronically filed with the Clerk of Court. A copy was also sent via U.S.

Mail to Defendant at the following address:

Auto Protection Plus
12900 Garden Cove Blvd #214
Garden Grove CA 92843-2006

,

Date: March 12, 2021

By: /s/ Amy L.B. Ginsburg

AMY L. B. GINSBURG, ESQUIRE
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